



November 25, 2013

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Hon. Alvin K. Hellerstein
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

**Re: In Re Combined World Trade Center and Lower Manhattan Disaster Site Litigation
21 MC 103 (AKH)**

Dear Judge Hellerstein:

This office represents the interests of defendants Tishman Construction Corporation of New York; Tishman Construction Corporation of Manhattan and Tishman Interiors Corporation ("Tishman entities"). Please accept this joint submission on behalf of Robert Grochow, Esq., counsel for certain plaintiffs in this litigation, and the Tishman entities.

Pursuant to the Status Conference Order dated November 20, 2013, Mr. Grochow and I were to submit a Stipulation signed by Plaintiffs' Liaison Counsel, counsel for the Tishman entities and Defense Liaison Counsel settling the claims against the Tishman entities relating to work performed at the World Trade Center. Both parties have agreed to a settlement in principal, however, we respectfully request additional time to submit the Stipulation and Settlement Agreement to the Court, in order to allow the Tishman entities to approve and execute the Settlement Agreement. We respectfully request that the Stipulation and Settlement Agreement be submitted by December 3, 2013.

Respectfully,

GREGORY J. CANNATA & ASSOCIATES

Robert Grochow

BY: Robert A. Grochow, Esq.

COZEN O'CONNOR

[Signature]
By: Michael A. Savino

*So ordered
11-25-13
[Signature]*